

Laura E. Rosenbaum, OSB No. 110061  
laura.rosenbaum@stoel.com  
STOEL RIVES LLP  
760 SW Ninth Avenue, Suite 3000  
Portland, OR 97205  
Telephone: 503.224.3380  
Facsimile: 503.220.2480

Attorneys for Defendant

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

LENA SLAWINSKA, individually,

Case No.: 3:22-CV-1626

Plaintiff,

**DEFENDANT'S NOTICE OF  
REMOVAL OF ACTION UNDER 28  
U.S.C. § 1332**

v.

CBRE, INC., a Delaware corporation,

Defendant.

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**TO: THE CLERK OF THE ABOVE-ENTITLED COURT**

**AND TO: PLAINTIFF LENA SLAWINSKA**

**PLEASE TAKE NOTICE** that Defendant CBRE, Inc. ("CBRE") hereby removes to this Court the state court action described below.

1. On September 17, 2022, an action was commenced in the Circuit Court of the State of Oregon in the County of Multnomah, entitled *Lena Slawinska v. CBRE, Inc.*, Case No. 22CV31775. Service was effected on September 22, 2022. A copy of the Proof of Service is attached as Exhibit 1. CBRE received a copy of the Summons and Complaint.

2. This Court has original jurisdiction over Plaintiff's Complaint pursuant to 28 U.S.C. § 1332(a)(1) because there is complete diversity of citizenship between the parties and the amount in controversy exceeds \$75,000. Plaintiff is a citizen of Oregon. Complaint ¶ 1. CBRE is a foreign business corporation with its principal place of business in Dallas, Texas. Declaration of in Support of Notice of Removal ¶ 2. It is therefore a citizen of Texas for diversity purposes. Plaintiff seeks damages in excess of \$75,000, as the Complaint provides for a \$160,480 Prayer for Relief. Complaint ¶¶ 46, 47. The amount in controversy therefore exceeds \$75,000.

3. This Notice of Removal is timely under 28 U.S.C. § 1446(b). CBRE has not yet answered or otherwise responded to the Complaint, and the time to respond has not expired.

4. Removal to the United States District Court for the District of Oregon, Portland Division, is proper under 28 U.S.C. § 1441 and Local Rule 3-2(a)(1) because the Complaint was filed in the Circuit Court for the County of Multnomah.

5. Pursuant to 28 U.S.C. § 1446(d), upon the filing of this Notice of Removal, CBRE shall file a Notice of Filing Notice of Removal with this Notice of Removal attached, with the Clerk of the Circuit Court of the State of Oregon for the County of Multnomah in accordance with 28 U.S.C. § 1446(d) and a copy will be served on Plaintiff.

6. By filing this Notice of Removal, CBRE does not waive, and expressly reserves, any and all defenses, affirmative defenses, and counterclaims that may be available to it.

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WHEREFORE, CBRE removes the above-captioned action now pending against it in the Circuit Court of the State of Oregon for the County of Multnomah to the United States District Court for the District of Oregon, where it shall proceed as an action originally commenced there.

DATED: October 24, 2022.

STOEL RIVES LLP

*s/ Laura E. Rosenbaum*  
LAURA E. ROSENBAUM, OSB No. 110061  
laura.rosenbaum@stoel.com  
Telephone: 503.224.3380

Attorneys for Defendant